

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
SHANNELL JONES MCCALL)	Case No. 20-31325-KRH
)	Chapter 13
Debtor)	

MOTION TO INCUR DEBT

COMES NOW, the Debtor, by counsel, and as and for her Motion to Incur Debt, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on March 9, 2020.
2. The Debtor has applied for and Basic Auto Sales RVA has approved a loan to the Debtor in the amount of \$21,357.38 plus interest at 16.99% per annum to be repaid with 72 equal monthly payments of \$475.00 for the purchase of a 2020 Nissan Altima or similar vehicle.
3. The Debtor needs to purchase the referenced vehicle because her current vehicle has broken down, and she needs a replacement vehicle to travel to and from work.
4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate her ability to perform under her Chapter 13 Plan filed herein.
5. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor requests that the Court enter an Order approving the aforesaid loan on the terms stated herein and for such other relief as the Court may deem appropriate.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

SHANNELL JONES MCCALL

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
SHANNELL JONES MCCALL)	Case No. 20-31325-KRH
)	Chapter 13
Debtor)	

NOTICE OF MOTION AND HEARING

The above Debtor has filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within twenty-one (21) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **December 16, 2020 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: December 9, 2020

SHANNELL JONES MCCALL

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

Label Matrix for local noticing
0422-3
Case 20-31325-KRH
Eastern District of Virginia
Richmond
Tue Dec 8 16:29:08 EST 2020

United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219-1888

Ashton Square Apartments
603-A Westover Hills Blvd.
Richmond, VA 23225-0000

Cascade Capital
Santander Consumer USA
1670 Corporate Cir
Petaluma, CA 94954-6946

Department Stores National Bank
c/o Quantum3 Group LLC
PO Box 657
Kirkland, WA 98083-0657

Dept. of Treasury -
Internal Revenue Service
P. O. Box 7346
Philadelphia, PA 19101-7346

(p)DSNB MACY S
CITIBANK
1000 TECHNOLOGY DRIVE MS 777
O FALLON MO 63368-2222

IC System, Inc
Attn: Bankruptcy
Po Box 64378
Saint Paul, MN 55164-0378

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Peroutka, Miller, Klima & Peters
8028 Ritchie Highway, Ste 300
Pasadena, MD 21122-1360

Santander Consumer USA
Attn: Bankruptcy
601 Penn St
Reading, PA 19601-3544

Trexis Insurance
PO Box 64378
Saint Paul, MN 55164-0378

Verizon
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901

Verizon Wireless
P.O. Box 25505
Lehigh Valley, PA 18002-5505

Virginia Department of Taxatio
PO Box 2369
Richmond, VA 23218-2369

Wells Fargo Bank NA
Attn: Bankruptcy
1 Home Campus Mac X2303-01a
Des Moines, IA 50328-0001

Carl M. Bates
341 Dial 866-813-0912 Code: 8576180
P. O. Box 1819
Richmond, VA 23218-1819

James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

John P. Fitzgerald, III
Office of the US Trustee - Region 4 -R
701 E. Broad Street, Ste. 4304
Richmond, VA 23219-1849

Shannell Jones McCall
625 Westover Hills Blvd.
Apartment G
Richmond, VA 23225-4582

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Department Store National Bank/Macy's
Attn: Bankruptcy
9111 Duke Boulevard
Mason, OH 45040-0000

Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-9617

(d)Jefferson Capital Systems, LLC
Attn: Bankruptcy
16 Mclelland Road
Saint Cloud, MN 56303-0000

End of Label Matrix
Mailable recipients 19
Bypassed recipients 0
Total 19